IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO

EASTERN DIVISION

UNITED STATES OF AMERICA,) CASE NO. 1:17CR083
	Plaintiff,)) JUDGE JOHN R. ADAMS
v.)
OMAR S. WILLIAMS,))
	Defendant.) GOVERNMENT'S MOTION FOR
		EXTENSION OF TIME

The United States, by and through Rebecca C. Lutzko, United States Attorney, and Henry F. DeBaggis, Assistant U.S. Attorney, respectfully submits Government's Motion for Extension of Time for at least thirty (30) days to respond to Defendant's Motion for Compassionate Release Pursuant to 18 U.S.C. § 3582(c)(1)(A) and First Step Act of 2018. (R. 226: Motion, PageID 1920).

On September 13, 2023, Defendant filed a forty (40) page motion for compassionate release. *Id.* Government counsel was on personal leave on the date the motion was filed and returned to the office on September 20, 2023. Given the length of the motion, the multiple legal and other issues presented, the government respectfully requests additional time to file an informed response to Defendant's motion.

WHEREFORE it is respectfully requested that the Court grant Government's Motion for an Extension of Time.

Respectfully submitted,

REBECCA C. LUTZKO United States Attorney

By: /s/ Henry F. DeBaggis

Henry F. DeBaggis (Ohio: 0007561) Assistant United States Attorney 400 United States Courthouse 801 West Superior Avenue Cleveland, Ohio 44113

216.622.3749 / Fax: 216.522.7499 <u>Henry.DeBaggis@usdoj.gov</u>

SERVICE

On September 21, 2023, a copy of Government's Motion for Extension of Time was mailed to Omar S. Williams, Reg. No. 64600-060, FCI Milan, P.O. Box 1000, Milan, MI 48160, by regular U.S. Mail.

/s/ Henry F. DeBaggis Henry F. DeBaggis Assistant U.S. Attorney